

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF VIRGINIA

3 -----x

4 UNITED STATES OF AMERICA, et al.,

5 Plaintiff,

6 -against- Civil Action No.

7 GOOGLE LLC, 1:23-cv-00108

8 Defendant.

9 ***CAPTION CONTINUED***

10 -----x

11 VIDEOTAPED STENOGRAPHIC DEPOSITION OF:
12 EISAR A. LIPKOVITZ
13 Thursday, November 9, 2023
14 Washington, D.C.
15 9:07 a.m. - 5:09 p.m.
16 HYBRID DEPOSITION
17
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19
20

21 Reported stenographically by:
22 Richard Germosen, FAPR, CA CSR No. 14391
23 RDR, CRR, CCR, CRCR, CSR-CA, NYACR, NYRCR
24 NCRA/NJ/NY/CA Certified Realtime Reporter
25 NCRA Realtime Systems Administrator
Job No. 2023-905987

1 Q. Okay. You're represented by counsel
2 today?

3 A. I am.

4 Q. And the counsel just identified
5 themselves on the record?

6 A. Yes, Julia and --

7 Q. And those counsel represent you in
8 your individual capacity?

9 A. That's my understanding, yeah.

10 Q. And is Google paying for your
11 counsel?

12 A. That's my understanding. I am not.

13 Q. Pardon me?

14 A. I'm not paying, so somebody is.

15 Q. Have you been offered independent
16 counsel separate from counsel representing Google?

17 A. Yes.

18 Q. And did you decline that offer?

19 A. I did. I didn't completely
20 understand, you know, the circumstances. It doesn't
21 actually matter to me, but yes.

22 Q. And did Google offer to pay for that
23 independent counsel as well?

24 A. I'm not sure actually.

25 Q. Okay. Do you have any form of